

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

AMY PATRICK, M.D.,)
)
Plaintiff,) C.A. No. 19-CV-02106-CFC
v.)
)
RELIANCE STANDARD LIFE)
INSURANCE COMPANY,)
)
Defendant.)

**DECLARATION OF ROBERT E. SAINT IN SUPPORT OF PLAINTIFF'S
STATEMENT IN SUPPORT OF AN AWARD OF REASONABLE
ATTORNEYS' FEES AND COSTS PURSUANT TO 29 U.S.C. § 1132(g)**

Comes now Robert E. Saint, who, swears under the penalties for perjury, that the following statements are true and accurate:

1. I am the Declarant; I am at least eighteen (18) years of age; I am of sound mind and competent to testify; and I speak with personal knowledge of the following.
2. I graduated from Indiana University School of Law (now referred to as Indiana University McKinney School of Law) in May, 1979.
3. I am duly admitted to practice law and in good standing before the Indiana Supreme Court; the United States District Courts for the Northern and Southern Districts of Indiana; before the United States Seventh Circuit Court of Appeals and the United States Supreme Court.

4. I have been engaged in the private practice of law for more than thirty-nine years. During the past thirty years, I have regularly represented professionals, primarily physicians, against their disability insurance carriers. During that time, I have represented professionals in hundreds of claims and lawsuits against more than twenty different disability insurance companies.

5. In the context of my representation, I regularly represent individuals in group disability policies governed by ERISA and individual policies governed by state law.

6. My representation of professionals in this context involves professionals who have suffered from a variety of medical, physical and mental health conditions.

7. Attached hereto is an itemized copy of the hours I have expended in this case, which do not include any time expended prior to preparation of the complaint which was filed in this case. The attached time records do not include any time during the claims process or the administrative appeal.

FURTHER DECLARANT SAYETH NOT.

I declare under the penalties for perjury that the foregoing statements are true and accurate.

April 5, 2021

Date



Robert E. Saint